

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PAUL CONTI,

Plaintiff / Counterclaim-
Defendant

-against-

JOHN DOE,

Defendant / Counterclaim-
Plaintiff.

No. 17-CV-9268 (VEC)

**DECLARATION OF ANDREW G. CELLI, JR., IN SUPPORT
OF DEFENDANT/COUNTERCLAIM-PLAINTIFF JOHN DOE'S
MOTION FOR SUMMARY JUDGMENT**

ANDREW G. CELLI, JR., declares under penalty of perjury pursuant to 28 U.S.C
§ 1746, that the following is true and correct:

1. My name is Andrew G. Celli, Jr. I am a partner in the firm of Emery Celli Brinckerhoff & Abady LLP, counsel for Defendant/Counterclaim-Plaintiff John Doe. I submit this declaration in support of Defendant/Counterclaim-Plaintiff Doe's Motion for Summary Judgment.
2. Annexed as **Exhibit A** is a true and accurate anonymized copy of a thread of text messages sent by Doe to Plaintiff/Counterclaim-Defendant Dr. Paul Conti. A redacted copy of this same text message thread was attached to Plaintiff's First Amended Complaint as Ex. A.
3. Annexed as **Exhibit B** is a true and accurate anonymized copy of an email John Doe sent Conti on June 15, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. B.

4. Annexed as **Exhibit C** is a true and accurate anonymized copy of an email Conti sent John Doe on June 14, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. C.

5. Annexed as **Exhibit D** is a true and accurate anonymized copy of an email Conti sent Jane and James Doe on April 7, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. D.

6. Annexed as **Exhibit E** is a true and accurate anonymized copy of an email John Doe sent Conti on April 7, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. E.

7. Annexed as **Exhibit F** is a true and accurate anonymized copy of an email John Doe sent Conti on June 13, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. F.

8. Annexed as **Exhibit G** is a true and accurate anonymized copy of an email John Doe sent Conti on June 18, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. G.

9. Annexed as **Exhibit H** is a true and accurate anonymized copy of an email John Doe sent Conti on July 14, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. H.

10. Annexed as **Exhibit I** is a true and accurate anonymized copy of an email John Doe sent Conti on July 29, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. I.

11. Annexed as **Exhibit J** is a true and accurate anonymized copy of an email John Doe sent Conti on August 10, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. J.

12. Annexed as **Exhibit K** is a true and accurate anonymized copy of an email John Doe sent Conti on August 18, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. K.

13. Annexed as **Exhibit L** is a true and accurate anonymized copy of an email John Doe sent Conti on September 7, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. L.

14. Annexed as **Exhibit M** is a true and accurate anonymized copy of an email John Doe sent Conti on November 9, 2017 at 4:35 p.m. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. M.

15. Annexed as **Exhibit N** is a true and accurate anonymized copy of an email John Doe sent Conti on November 9, 2017 at 4:56 p.m. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. N.

16. Annexed as **Exhibit O** is a true and accurate anonymized copy of an email John Doe sent Conti on November 23, 2017. A redacted copy of this same email was attached to Plaintiff's First Amended Complaint as Ex. O.

17. Annexed as **Exhibit P** is a true and accurate anonymized copy of a May 31, 2016 medical record (DEF0000540).

18. Annexed as **Exhibit Q** is a true and accurate anonymized copy of a May 31, 2016 medical record (DEF0000446).

19. Annexed as **Exhibit R** is a true and accurate anonymized copy of a January 24, 2017 medical record (DEF0000479).

20. Annexed as **Exhibit S** is a true and accurate anonymized copy of a January 30, 2017 medical record (DEF0000250).

21. Annexed as **Exhibit T** is a true and accurate anonymized copy of a January 25, 2017 medical record (DEF0000478).

22. Annexed as **Exhibit U** is a true and accurate anonymized copy of the declaration of John Doe, dated December 15, 2020.

23. Annexed as **Exhibit V** is a true and accurate anonymized copy of the declaration of Alan Dershowitz, dated November 18, 2020.

24. Annexed as **Exhibit W** is a true and accurate anonymized copy of a February 24, 2017 medical record (PC000972–73).

25. Annexed as **Exhibit X** is a true and accurate anonymized copy of a March 16, 2017 medical record (DEF0000457).

26. Annexed as **Exhibit Y** is a true and accurate anonymized copy of an April 6, 2017 medical record (DEF0000450).

27. Annexed as **Exhibit Z** is a true and accurate anonymized copy of an email Conti sent Doe and others on April 7, 2017 (PC000094–97).

28. Annexed as **Exhibit AA** is a true and accurate copy of an excerpt from Doe's PPG treatment schedule (PC000053).

29. Annexed as **Exhibit BB** is a true and accurate copy of an excerpt from Doe's PPG treatment schedule (PC000026).

30. Annexed as **Exhibit CC** is a true and accurate anonymized copy of an excerpt from Doe's PPG progress notes (DEF0000413).

31. Annexed as **Exhibit DD** is a true and accurate anonymized copy of a March 28, 2017 email from Dovi Meyer to Amber Carr Blum at PPG (DEF0000783).

32. Annexed as **Exhibit EE** is a true and accurate anonymized copy of Dovi Meyer's March 28, 2017 emails to John Doe (DEF0000788–89).

33. Annexed as **Exhibit FF** is a true and accurate anonymized copy of text message exchanges between Mark Schorr and Sonali Patel (PC000381–82).

34. Annexed as **Exhibit GG** is a true and accurate anonymized copy of Amber Carr Blum's March 28, 2017 email to Dovi Meyer (DEF0000785).

35. Annexed as **Exhibit HH** is a true and accurate anonymized copy Sonali Patel's March 28, 2017 text message exchange with Amber Carr Blum (PC1327).

36. Annexed as **Exhibit II** is a true and accurate anonymized copy of the December 15, 2020 declaration of Jane Doe.

37. Annexed as **Exhibit JJ** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Dr. Paul Conti, taken on June 12, 2019.

38. Annexed as **Exhibit KK** is a true and accurate anonymized copy of excerpts of the transcribed deposition of John Doe, taken on May 15, 2019.

39. Annexed as **Exhibit LL** is a true and accurate anonymized copy of excerpts of the transcribed deposition of James Doe, taken on July 8, 2019 and February 11, 2020.

40. Annexed as **Exhibit MM** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Jane Doe, taken on February 12, 2020.

41. Annexed as **Exhibit NN** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Dr. Michael Jenike, taken on July 30 and October 28, 2019.

42. Annexed as **Exhibit OO** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Dr. Robin Lippert, taken on July 31, 2019.

43. Annexed as **Exhibit PP** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Alan Dershowitz, taken on July 19, 2020.

44. Annexed as **Exhibit QQ** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Mark Schorr, taken on May 6, 2019.

45. Annexed as **Exhibit RR** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Sonali Patel, taken on May 7 and 8, 2019.

46. Annexed as **Exhibit SS** is a true and accurate anonymized copy of excerpts of the transcribed deposition of David “Dovi” Meyer, taken on June 14, 2019.

47. Annexed as **Exhibit TT** is a true and accurate anonymized copy of excerpts of the transcribed deposition of Amber Carr Blum, taken on May 8, 2019.

Dated: December 18, 2020
New York, New York

/s/
ANDREW G. CELLI, JR.